



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

October 14, 2005

Cecil McIntyre, Treasurer  
District No 1-PCD MEBA Political  
Action Fund (MEBA-PAF)  
444 N. Capitol Street, N.W., Suite 8000  
Washington, D.C. 20001

**Response Due Date:**  
**November 14, 2005**

Identification Number: C00279380

Reference: July Monthly Report (6/1/05-6/30/05)

Dear Mr. McIntyre:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent

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to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Schedule B of your report discloses in-kind contributions not designated for a particular election, but made before the primary election (see attached). In-kind contributions of equipment, such as computers, with a long-term useful life (e.g., an election cycle, or perhaps longer) are similar to contributions of money and may be designated for elections beyond the next election, provided the contributor designates the contribution as such in writing. A contribution of this type of equipment is distinguishable from in-kind contributions that are used only for one particular election, such as non-exempt contributions of food or beverages consumed by primary election day workers, or printing or mailing costs related to general election events or fundraisers. Please amend your report to include a description of the nature of the in-kind contribution(s) in question. If the in-kind contribution(s) on your report does not have a "long-term useful life", it may constitute an excessive contribution(s) for the primary election when combined with other contributions made to the candidate(s). (see Advisory Opinion 1996-29)

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be reported on Schedule A supporting Line 16 of the Detailed Summary Page of the report covering the period in which they are received. Redesignations should be reported as memo entries on Schedule B of the report covering the period in which the redesignation is made. 11 CFR §110.2(b)

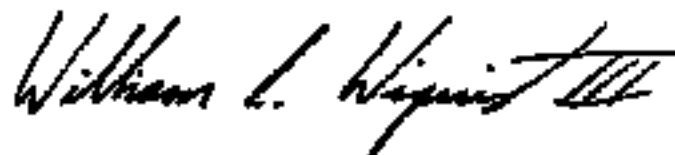
Although the Commission may take further legal steps, prompt action by your committee to refund or seek redesignation of the excessive amount will be considered.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Federal operating expenditures should be properly disclosed on a separate Schedule B, supporting Line 21(b) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1394.

Sincerely,



William S. Wiquist  
Senior Campaign Finance Analyst  
Reports Analysis Division

**Possible Excessive Contributions**

Recipient Name	Date	Amount	Election	Report
Dutch Ruppersberger for Congress	3/7/05	\$1,000.00	P2006	2005 April Monthly
Dutch Ruppersberger for Congress	5/3/05	\$1,000.00	P2006	2005 June Monthly
Dutch Ruppersberger for Congress	5/3/05	\$1,000.00	P2006	2005 June Monthly
Dutch Ruppersberger for Congress	6/6/05	\$4,000.00	P2006	2005 July Monthly
Bill Nelson for Senate	5/6/03	\$2,000.00*	P2006	2003 June Monthly
Bill Nelson for Senate	3/18/04	\$2,000.00*	P2006	2004 April Monthly
Bill Nelson for Senate	4/25/05	\$2,000.00	P2006	2005 May Monthly
Bill Nelson for Senate	6/28/05	\$1,000.00	P2006	2005 July Monthly

\*Schedule B of your report discloses these contributions as designated to the 2004 Primary election; however, this candidate did not participate in a Primary election in 2004. Therefore, this contribution has been attributed to the next scheduled Federal election for this candidate, the 2006 Primary election.

**Possible Excessive In-Kind Contributions**

Recipient Name	Date	Amount	Report
Friends of Bernie Thompson	6/6/05	\$360.00	2005 July Monthly
John Salazar for Congress	6/6/05	\$262.34	2005 July Monthly

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